

EQUALITY AND DIVERSITY POLICY

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The on-line version is the only version that is maintained. Any printed copies should, therefore, be viewed as ‘uncontrolled’ and as such may not necessarily contain the latest updates and amendments.

POLICY AMENDMENTS

Amendments to the Policy will be issued from time to time. A new amendment history will be issued with each change.

New Version Number	Issued by	Nature of Amendment	Approved by and Date	Date on Intranet
1.0	Harrogate and Rural District Clinical Commissioning Group	New Policy	JTUPF 28 January 2015 and HaRD CCG SMT 06 January 2015	09 February 2015

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1 INTRODUCTION

Harrogate and Rural District Clinical Commissioning Group (hereafter referred to as 'the CCG') is committed to providing equality of opportunity for all employees. This policy is underpinned by the CCG Visions and Values. The CCG is dedicated to employment practices, policies and procedures which ensure that no employee, or potential employee, receives less favourable treatment on the grounds of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union affiliation, disability, offending background, domestic circumstances, social and employment status, HIV status, gender reassignment, political affiliation or any other personal characteristic. Diversity will be viewed positively and, in recognising that everyone is different, the unique contribution that each individual's experience, knowledge and skills can make is valued equally.

The promotion of equality and diversity will be actively pursued through policies and procedures which will ensure that employees receive fair, equitable and consistent treatment and make certain that employees, and potential employees, are not subject to discrimination.

The CCG will develop Equality Schemes that will outline the plans to deliver its obligations under the Equality Act (2010).

2 ENGAGEMENT

This policy has been developed by the Yorkshire and Humber Commissioning Support's Workforce Team in partnership with employees, managers and trade unions and approved at the Joint Trade Union Partnership Forum.

3 IMPACT ANALYSES

3.1 Equality

In applying this policy the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristics.

In developing this policy, an Equality Impact Analysis has been undertaken.

The application of this policy will be monitored alongside equality and diversity monitoring data to ensure fair application.

3.2 Sustainability

The policy has been assessed against the CCG's sustainability themes and this policy may have a negative / positive effect. The Sustainability Impact Assessment is attached at Appendix 2.

3.3 Bribery Act 2010

The CCG follows good NHS business practice as outlined in the NHS England Fraud, Bribery & Corruption: Policy & Corporate Procedures and NHS England Standards of Business Conduct Policy and has robust controls in place to prevent bribery.

Under the Bribery Act 2010, it is a criminal offence to :

- bribe another person by offering, promising or giving a financial or other advantage to induce them to perform improperly a relevant function or activity, or as a reward for already having done so; and
- be bribed by another person by requesting, agreeing to receive or accepting a financial or other advantage with the intention that a relevant function or activity would then be performed improperly, or as a reward for having already done so.

Due consideration has been given to the Bribery Act 2010 in the development of this policy document and consistent application of this policy will mitigate bribery in relation to Equality and Diversity.

In all cases the potential that fraud has occurred should be considered. A referral to NHS Protect should be made if there is any evidence or suspicion of fraud. To raise any suspicions of fraud and / or corruption please contact the Counter Fraud Specialist at NHS Protect - 0191 2046336 or 01744 648749.

Concerns may also be discussed with the Chief Finance Officer or the Audit & Integrated Governance Committee Chair.

If preferred, staff may call the NHS Fraud & Corruption Reporting Line on 0800 028 40 60 between 08:00 – 18:00 Monday-Friday or report online at www.reportnhsfraud.nhs.uk. This would be the suggested contact if there is a concern that the LCFS or the Chief Finance Officer themselves may be implicated in suspected fraud, bribery or corruption.

4 SCOPE

The policy applies to all CCG staff including volunteers, contractors, agency workers and visitors and supersedes all previous policies on Equality and Diversity.

5 POLICY PURPOSE AND AIMS

This document sets out the CCG's approach to Equality and Diversity within the organisation. This should be read together with other CCG policies and procedures in addition to the CCG's Equality, Diversity and Human Rights Strategy 2013 - 17.

This policy provides guidance to all CCG staff as to the expected attitudes and behaviours in relation to equality and diversity in the workplace. The CCG aims to build a fully inclusive organisation by creating an environment in which individual differences and the contributions of all our staff are recognised and valued.

6 DEFINITIONS

Direct Discrimination - Direct discrimination occurs when a person or group are treated less favourably than another on the basis of their age, gender, race, ethnic or national origin, domestic circumstances, social and employment status, religion, sexual orientation, disability, membership of a Trade Union or other grounds which cannot be justified.

Indirect Discrimination - Indirect discrimination occurs when a requirement or condition, although equally applied to all people, disproportionately disadvantages a certain group.

Discrimination by Perception - Perceived disability is where the person does not actually have a protected characteristic, but the discriminator mistakenly thinks they do.

Discrimination by Association – Discrimination by association occurs where a person is treated unfavourably not due to having a protected characteristic themselves, but due to their association with a person who has a personal characteristic as defined under the Equality Act 2010.

Failure to make a reasonable adjustment - Under disability legislation, discrimination also refers to failure to make a reasonable adjustment to the workplace or to employment arrangements without justification. This is in order that the disabled person is not put at any substantial disadvantage compared to a non-disabled person.

Victimisation - Victimisation occurs when someone is treated less favourably because they have previously made a complaint of discrimination.

Age - This means a person belonging to a particular age group. This includes people of the same age and people of a particular range of ages, e.g., Over 60s or under 21s.

Disability - Protection is provided where someone has a physical or mental impairment which is substantial and has a long term adverse effect on the person's ability to carry out normal day to day activities.

Sex - Protection is provided for both men and women to ensure equitable treatment for both sexes

Sexual Orientation (e.g. Heterosexual, Homosexual and Bisexual) - Protection is provided for all sexual orientation to ensure equitable treatment for all

Transgender - Protection is provided where someone has proposed, started or completed a process to change their sex. It is clear that there is no requirement to be undergoing medical treatment or supervision.

Marriage and civil partnership - Protection from discrimination for being married or in a civil partnership is provided in employment and vocational training only.

Pregnancy and maternity - For all areas covered by the Act a woman is protected from unfavourable treatment because of pregnancy or because she has given birth.

Race - 'Race' includes colour, nationality and ethnic or national origins. A racial group can also be made up of two or more distinct racial groups.

Religion and Belief - Religion means any religion and includes a lack of religion. It is for the courts to determine what constitutes a religion.

7 ROLES / RESPONSIBILITIES / DUTIES

Good working relations are vital for the organisation to operate successfully and provide services. There is a joint responsibility for management, trade unions and employees to accept the responsibility of working together on issues in good faith and with the shared intention of facilitating good working relations.

Joint Responsibilities

It is a joint responsibility to :

- Always behave in a way which is supportive and consistent with this policy

CCG Senior Management Team and Governing Body Responsibilities

It is the responsibility of the CCG Senior Management Team and Governing Body to :

- Set the right culture to encourage, foster and improve relations and Equality and Diversity within the CCG.
- Ensure that the CCG is compliant with all relevant Equality and Diversity legislation
- Ensure that the CCG meets its commitments and objectives as outlined within the procedure sections 1-6 of this policy.

Employees' Responsibilities

It is the responsibility of employees to :

- Promote equality and diversity, challenge discrimination where / whenever it occurs if you feel able to do so. - you must not unfairly discriminate, bully, harass and/or intimidate in any area of your work or encourage others to do so
- Report any unfair discrimination, bullying / harassment / intimidation to your line manager if you suspect this is taking place.
- Support colleagues who make a complaint of discrimination, bullying / harassment

- Co-operate with any measures introduced to promote equality and diversity in the workplace

Line Manager Responsibilities

It is the responsibility of line managers to :

- Inform employees on their rights and responsibilities under the policy.
- Ensure that equality and diversity is an integral part of employee induction.
- Encourage employees, particularly those in disadvantaged groups to take up courses to enhance promotion and career development.
- Guard against the use of language and behaviour that could be perceived as, or have the effect of, being racist, sexist, or demeaning to groups covered by the Equality and Diversity Policy.
- Create and maintain employment records as required with the equalities duties.

Human Resources Team Responsibilities

It is the responsibility of the HR team to :

- Advise managers and staff on their rights and responsibilities under the policy.
- Help inform the workforce of the policy.
- Ensure the concept of equality and diversity is an integral part of all the employment policies of the CCG.
- Provide appropriate training

8 IMPLEMENTATION

The CCG Senior Management Team is responsible for formal approval and monitoring compliance with this policy. Following ratification the policy will be disseminated to staff via the organisation's intranet.

9 TRAINING AND AWARENESS

This Policy will be available to view on the CCG website. Training and support will be available to all line managers in the implementation and application of this policy.

10 MONITORING AND AUDIT

The implementation of this policy will be audited on an annual basis by the Workforce team and reported to the CCG senior management team.

11 POLICY REVIEW

This policy will be reviewed every three years by the Workforce Team in conjunction with operational managers and trade union representatives. Earlier review may be required in response to exceptional circumstances, organisational change or relevant changes in legislation or guidance. Where review is necessary due to legislative change, this will happen immediately.

12 REFERENCES

- <http://www.harrogateandruraldistrictccg.nhs.uk/who-we-are/equality-diversity-human-rights/>
- Grievance Policy
- Harassment and Bullying Policy
- Disciplinary Policy
- Equality Act 2010

13 ASSOCIATED DOCUMENTATION

- Frequently Asked Questions – The Equality Act 2010
Equality and Human Right Commission
<http://www.equalityhumanrights.com/private-and-public-sector-guidance/guidance-all/faqs>
- Equality and Diversity Guide
Advisory, Conciliation and Arbitration Service (ACAS)
<http://www.acas.org.uk/media/pdf/k/t/Delivering-equality-and-diversity-summary-guide.pdf>

PROCEDURE

1 Public Sector Equality Duty

The Equality Act 2010 imposes further duties on Public Sector organisations through the Public Sector Equality Duty (PSED) which came into force in April 2011. The PSED covers the following characteristics; age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The general Public Authority Equality Duty can be found in section 149 of the Equality Act 2010 :

<https://www.gov.uk/government/publications/public-sector-quick-start-guide-to-the-public-sector-equality-duty>

The main points detailed within the policy can be found below :

A Public Authority must, in the exercise of its functions, have due regard to the need to :

- eliminate discrimination, harassment, victimisation and any other conduct prohibited by, or under the Equality Act 2010
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Please note, the protected characteristic of marriage and civil partnership is covered by the PSED only in relation to section a) in the list described above.

The Equality Duty is supported by specific duties, set out in regulations which came into force in September 2011. These additional specific duties require that public bodies publish relevant, proportionate information demonstrating their compliance with the Equality Duty and to set themselves specific, measurable equality objectives.

The specific duties require Public Authorities to:

- Publish information to show their compliance with the Equality Duty, at least annually; and
- Set and Publish Equality Objectives at least every four years.

All information must be published in a way which makes it easy for people to access it.

Further information relating to the Equality Act 2010, Public Sector (Specific Duties) can be found at : <https://www.gov.uk/government/publications/public-sector-quick-start-guide-to-the-specific-duties>

2 NHS Equality Delivery System

The NHS has introduced an Equality Delivery System (EDS) tool designed to support NHS commissioners and providers to deliver better outcomes for patients and communities and better working environments for staff, which are personal, fair and diverse. The EDS aims to assist organisations to achieve compliance with the Public Sector Equality Duty by encouraging them – in engagement with stakeholders – to review their equality performance and to identify future priorities and actions.

At the heart of the EDS is a set of 18 outcomes grouped into four objectives: These outcomes focus on the issues of most concern to patients, carers, communities, NHS staff and Boards. It is against these outcomes that performance is analysed and graded, and action determined.

The four EDS objectives are :

1. Better health outcomes for all
2. Improved patient access and experience
3. Empowered, engaged and included staff
4. Inclusive leadership at all levels

Information regarding the performance of the CCG in respect of the EDS tool can be found on the CCG website.

3 Recruitment and Selection

All recruitment and selection activity is required to accord with the CCG's policies on recruitment and selection. Recruitment and selection procedures are designed to identify the most suitable candidate to perform the job advertised, this is measured against the predetermined objective criteria set out in the Person Specification.

When advertising posts the CCG's will not discriminate by including any requirements or criteria which are unnecessary to the post. The CCG will not publish advertisements which indicate or could be reasonably understood to indicate, it has an intention to discriminate on such grounds.

Disabled candidates should be given the opportunity to suggest reasonable adjustments to the recruitment and selection process to meet their individual circumstances.

4 The 'Positive About Disabled People '2 Ticks' Symbol'

Critical to the successful implementation of this policy is for the organisation to be assessed and acquire the 'two ticks' symbol in its own right. It is recognition given by Jobcentre Plus to employers who have agreed to meet five commitments regarding the recruitment, employment, retention and career development of disabled people.

By using the symbol the organisation aims to make it clear to disabled job applicants that the organisation welcomes applications from disabled people and is positive about their abilities.

In addition to the above the organisation will continuously monitor the impact of all HR policies, organisational decisions and opportunities on all people associated with the organisation with disabilities to ensure that the organisation values their contribution and will treat them fairly should they become disabled.

It also underpins the theory that by employing disabled people the organisation will be better placed to understand the needs, develop and deliver goods and services for its disabled customers. The five standards to which we have committed are as follows :

Commitment 1

To interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities.

The aim of this commitment is to encourage disabled people to apply for jobs by offering an assurance that should they meet the minimum criteria they will be given the opportunity to demonstrate their abilities at interview stage.

Commitment 2

To ensure there is a mechanism/reference group in place to discuss, at any time, but at least once a year, with disabled employees what the organisation can do to support disabled employees and to understand better the non-visible barriers they face, and how in partnership those barriers can be addressed.

The aim of this commitment is to ensure that disabled employees are getting the same opportunities as others to develop and progress within their job.

Commitment 3

To make every effort through the effective implementation of reasonable adjustments that when employees become disabled to make sure they stay in employment with appropriate support measures in place.

The aim of this commitment is to make sure that employees know that, should they become disabled, they will have the organisations support to enable them to continue in their current job or an alternative one without detriment to their personal circumstances (with the required investment). Retaining an employee who has become disabled means keeping their valuable skills and experience and saves on the cost of recruiting a replacement.

Commitment 4

To take action to ensure that all employees develop the appropriate level of disability awareness needed to make our commitments work.

The aim of this commitment is to provide awareness of disability issues to all staff in order to improve the working environment.

Commitment 5

Each year, to review the five commitments and what has been achieved, to plan ways to improve on them and let employees and Jobcentre Plus know about progress and future plans.

The aim of this commitment is for us to monitor our own practices and achievements in meeting our symbol commitments and to identify areas for further progress or good practice to share with others. The commitment also helps us to plan how to let people know initially that the organisation has become a symbol user, and to keep them up to date with developments. Progress will be fed back to Jobcentre Plus at our annual review.

5 Positive About Mental Health

MINDFUL EMPLOYER ®

The Mindful Employer initiative is a voluntary agreement that promotes awareness of mental health at work and provides support for businesses in recruiting and retaining staff.

By signing up to 'Charter for Employers Positive About Mental Health' organisation recognises that :

- People who have mental health issues may have experienced discrimination in recruitment and selection procedures. This may discourage them from seeking employment.
- Whilst some people will acknowledge their experience of mental health issues in a frank and open way, others fear that stigma will jeopardise their chances of getting a job.
- Given appropriate support, the vast majority of people who have experienced mental ill health continue to work successfully as do many with ongoing issues.

The organisation aims to :

- Show a positive and enabling attitude to employees and job applicants with mental health issues. This will include positive statements in local recruitment literature.
- Ensure that all staff involved in recruitment and selection are briefed on mental health issues and The Equality Act 2010, and given appropriate interview skills.
- Make it clear in any recruitment or occupational health check that people who have experienced mental health issues will not be discriminated against and that disclosure of a mental health problem will enable both employee and employer to assess and provide the right level of support or adjustment.
- Not make assumptions that a person with a mental health issue will be more vulnerable to workplace stress or take more time off than any other employee or job applicant.
- Provide non-judgemental and proactive support to individual staff who experience mental health issues.
- Ensure all line managers have information and training about managing mental health in the workplace.

A mental health condition is considered a disability if it has a long-term effect on your normal day-to-day activity. This is defined under the Equality Act 2010. There are many different types of mental health condition which can lead to a disability, including: dementia, depression, bipolar disorder, obsessive compulsive disorder, schizophrenia, self-harm etc.

6 Training

It is a requirement that all staff, inclusive of agency workers and bank staff complete the online statutory mandatory training on an annual basis. The completion of statutory mandatory training, including the equality and diversity element will be reviewed annually during the appraisal process. Failure to complete the training could result in the deferral of incremental pay increases, please refer to the objective setting and review policy for further details.

Additional training needs in relation to Equality and Diversity should be discussed with your line manager or the Y&HCS Workforce Team.

7 Reporting Procedures

Grievance Procedures

Where an employee feels that they have been unfairly treated through discrimination or victimisation in any form due to a protected personal characteristic as listed in part 1, section 1, advice should be sought from the workforce team. In the first instance, employees' should try where appropriate to resolve the matter informally. Where the issue cannot be satisfactorily resolved informally and the employee still feels aggrieved, a formal complaint should be raised through the CCG's grievance procedure.

Harassment and Bullying

Any employee who feels that they have been subject to inappropriate behaviour at work from another colleague should raise the issue with their line manager in the first instance. If the matter cannot be resolved informally, advice should be sought from the workforce team and a formal complaint raised under the CCG Bullying and Harassment Policy.

1. EQUALITY IMPACT ANALYSIS									
Policy / Project / Function:	Equality and Diversity Policy								
Date of Analysis:	December 2014								
This Equality Impact Analysis was completed by: (Name and Department)	Workforce Service								
What are the aims and intended effects of this policy, project or function ?	This document sets out the CCG's approach to Equality and Diversity within the organisation. This policy provides guidance to all CCG staff as to the expected attitudes and behaviours in relation to equality and diversity in the workplace. The CCG aims to build a fully inclusive organisation by creating an environment in which individual differences and the contributions of all our staff are recognised and valued.								
Please list any other policies that are related to or referred to as part of this analysis?	<ul style="list-style-type: none"> • Grievance Policy • Harassment and Bullying Policy • Disciplinary Policy • Equality Act 2010 								
Who does the policy, project or function affect ? Please Tick ✓	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Employees</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>Service Users</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Members of the Public</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Other (List Below)</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Employees	✓	Service Users	<input type="checkbox"/>	Members of the Public	<input type="checkbox"/>	Other (List Below)	<input type="checkbox"/>
Employees	✓								
Service Users	<input type="checkbox"/>								
Members of the Public	<input type="checkbox"/>								
Other (List Below)	<input type="checkbox"/>								

2. Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact
	Yes	No	Yes	No	
Race	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Age	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Sexual Orientation	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Disabled People	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Gender	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Transgender People	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Pregnancy and Maternity	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Marital Status	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Religion and Belief	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	See assessment test
Reasoning					

If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7

3. Equality Impact Analysis: Local Profile Data

Local Profile/Demography of the Groups affected as at Oct 2014
Population data from Harrogate and Rural District Equality, Diversity and Human Rights Strategy, June 2013 – March 2017

General	Total number of employees in the CCG is 24
Age	75% are aged 30-55 25% of staff are over 55 No employees are under 30 When compared to the national age profile the district has a lower percentage of people aged 0 – 29 and a higher proportion of people aged 45+ (shown in Figure 1 below). The average age in the district is 42 years old. Around 26.5% of the district's population are aged 60 and over; compared to 22.4% nationally.
Race	87.49% staff employed in the CCG are White 4.17% staff are Black 4.17% staff are Asian 4.17% of staff have are not stated/undefined their ethnicity Based on the 2011 Census information taken from council ward profiles making up the CCG area (Harrogate and Rural District), 96.3% identified themselves as White, 91.7% of residents identified themselves as White British.
Sex	58.34% staff employed are male 41.68% staff employed are female The gender split in the Harrogate and Rural District CCG area is 49.2% male and 50.8% female
Gender reassignment	No information at this stage There are no official statistics nationally or regionally regarding transgender populations, however, GIRES (Gender Identity Research and Education Society - www.gires.org.uk) estimated that, in 2007, the prevalence of people who had sought medical care for gender variance was 20 per 100,000, i.e. 10,000 people, of whom 6,000 had undergone transition. 80% were assigned as boys at birth (now trans women) and 20% as girls (now trans men).
Disability	91.67% of staff employed declared themselves as having no disability 8.33% did not declare /undefined No staff have declared a disability CCG Disability Profile Long Term Health Problem or Disability 2011 15.5%
Sexual Orientation	87.5% of staff described themselves as heterosexual 12.5% did not wish to respond /undefined Local population data is not available for sexual orientation. In part, this is because until recently national and local surveys of the population and people using services did not ask about an individual's sexual orientation. However, Stonewall estimates that 5 - 7% of the national population are lesbian, gay or bisexual.

<p>Religion, faith and belief</p>	<p>Christianity is the largest religious group declared by staff in the CCG (45.83%) 25% declared themselves Atheist 20.83% were undefined or did not wish to declare 4.17% of staff have other beliefs/religious beliefs 4.17% of staff declared themselves Buddhist</p> <p>98.6% of the district's population is either Christian, of no religion or did not state a religious belief (<i>2011 Census</i>). Of the remaining 1.4% of the district's population 0.4% are Muslim, 0.3% are Buddhist, 0.2% are Jewish and 0.5% are of other religions or beliefs.</p>
<p>Marriage and civil partnership</p>	<p>83.33% of employees are married. No employees are in a civil partnership. The remainder (16.67%) are single/divorced/legally separated or widowed</p> <p>Data from the Office of National Statistics covering the period 2008-2010 indicates that there were 18,049 Civil Partnerships in England and Wales during this three-year period – 52% men and 48% women</p>
<p>Pregnancy and maternity</p>	<p>No information yet as the CCG has not been established long enough to build meaningful data</p>

4. Equality Impact Analysis: Equality Data Available

<p>Is any Equality Data available relating to the use or implementation of this policy, project or function?</p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1. Application success rates <i>Equality Groups</i> 2. Complaints by <i>Equality Groups</i> 3. Service usage and withdrawal of services by <i>Equality Groups</i> 4. Grievances or decisions upheld and dismissed by <i>Equality Groups</i> 5. <i>Previous EIAs</i> 	<p>Yes <input checked="" type="checkbox"/> Employee and Population data</p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</p>	<p>Consultation has taken place with Trade Union representatives and employees</p>
<p>Promoting Inclusivity How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</p>	<p>This policy promotes inclusivity and contributes towards the aims of eliminating discrimination and promoting equality and diversity within the organisation. It should therefore have a positive impact on all protected groups. It also underpins the application of all other employment policies and should be used alongside the application of these. Monitoring of all categories of protected staff is essential</p>

5. Equality Impact Analysis: Assessment Test

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
Gender (Men and Women)		✓		It should be noted that low number of staff in the CCG can impact on the overall balance in each category. However, the workforce statistics are broadly reflective of the population data as a whole. This policy promotes inclusivity and contributes towards the aims of eliminating discrimination and promoting equality and diversity within the organisation. It should therefore have a positive impact on all protected groups. This will require routine monitoring. This applies to each category of this assessment test.
Race (All Racial Groups)		✓		
Disability (Mental and Physical)		✓		
Religion or Belief		✓		
Sexual Orientation (Heterosexual, Homosexual and Bisexual)		✓		

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
Pregnancy and Maternity		✓		
Transgender		✓		
Marital Status		✓		
Age		✓		

6. Action Planning

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
General monitoring of workforce statistics will routinely scrutinize the application of the policy and is good employment and equality and diversity practice	Routine monitoring of workforce statistics	CSU Workforce	Annually	Annually

7. Equality Impact Analysis Findings

Analysis Rating:	Red	Red/Amber	Amber	✓Green
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		Actions	Wording for Policy / Project / Function
<p>Red</p> <p>Stop and remove the policy</p>	<p>Red: As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the use of the policy be suspended until further work or analysis is performed.</p>	<p>Remove the policy</p> <p>Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.</p>	<p>No wording needed as policy is being removed</p>
<p>Red Amber</p> <p>Continue the policy</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.</p>	<p>The policy can be published with the EIA</p> <p>List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).</p> <p>Consider if there are any potential actions which would reduce the risk of discrimination.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason exists which justifies the use of this policy and further professional advice.</p> <p><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></p>

Equality Impact Findings (continued):

		Actions	Wording for Policy / Project / Function
<p>Amber</p> <p>Adjust the Policy</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>The policy can be published with the EIA</p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></p>
<p>Green</p> <p>No major change</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p>The policy can be published with the EIA</p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

Brief Summary/Further comments	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>
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Approved By		
Job Title:	Name:	Date:

SUSTAINABILITY IMPACT ASSESSMENT

Staff preparing a policy, Governing Body (or Sub-Committee) report, service development or project are required to complete a Sustainability Impact Assessment (SIA). The purpose of this SIA is to record any positive or negative impacts that this is likely to have on sustainability.

Title of the document	Equality and Diversity Policy
What is the main purpose of the document	This document sets out the CCG's approach to Equality and Diversity within the organisation.
Date completed	04 November 2014
Completed by	Nicola Cundall, Y&HCS Workforce team

Domain	Objectives	Impact of activity Negative = -1 Neutral = 0 Positive = 1 Unknown = ? Not applicable = n/a	Brief description of impact	If negative, how can it be mitigated? If positive, how can it be enhanced?
Travel	Will it provide / improve / promote alternatives to car based transport? Will it support more efficient use of cars (car sharing, low emission vehicles, environmentally friendly fuels and technologies)? Will it reduce 'care miles' (telecare, care closer) to home?	n/a		

	Will it promote active travel (cycling, walking)? Will it improve access to opportunities and facilities for all groups?			
Procurement	Will it specify social, economic and environmental outcomes to be accounted for in procurement and delivery? Will it stimulate innovation among providers of services related to the delivery of the organisations' social, economic and environmental objectives? Will it promote ethical purchasing of goods or services? Will it promote greater efficiency of resource use? Will it obtain maximum value from pharmaceuticals and technologies (medicines management, prescribing, and supply chain)? Will it support local or regional supply chains? Will it promote access to local services (care closer to home)? Will it make current activities more efficient or alter service delivery models	n/a		
Facilities Management	Will it reduce the amount of waste produced or increase the amount of waste recycled? Will it reduce water consumption?	n/a		
Workforce	Will it provide employment opportunities for local people? Will it promote or support equal employment opportunities? Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)? Will it offer employment opportunities to disadvantaged groups?	n/a 1 n/a n/a		
Community Engagement	Will it promote health and sustainable development? Have you sought the views of our communities in relation to the impact on sustainable development for this activity?	n/a		

Buildings	<p>Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?</p> <p>Will it increase safety and security in new buildings and developments?</p> <p>Will it reduce greenhouse gas emissions from transport (choice of mode of transport, reducing need to travel)?</p> <p>Will it provide sympathetic and appropriate landscaping around new development?</p> <p>Will it improve access to the built environment?</p>	n/a		
Adaptation to Climate Change	<p>Will it support the plan for the likely effects of climate change (e.g. identifying vulnerable groups; contingency planning for flood, heat wave and other weather extremes)?</p>	n/a		
Models of Care	<p>Will it minimising 'care miles' making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people's homes?</p> <p>Will it promote prevention and self-management?</p> <p>Will it provide evidence-based, personalised care that achieves the best possible outcomes with the resources available?</p> <p>Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways?</p>	n/a		